

REPORT BY THE  
AUDITOR GENERAL  
OF CALIFORNIA

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THE GROWTH AND COSTS OF CALIFORNIA'S  
INDEPENDENT STUDY PROGRAMS

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REPORT BY THE  
OFFICE OF THE AUDITOR GENERAL

P-755

THE GROWTH AND COSTS OF CALIFORNIA'S  
INDEPENDENT STUDY PROGRAMS

JULY 1988



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STATE OF CALIFORNIA  
**Office of the Auditor General**

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Thomas W. Hayes  
Auditor General

July 7, 1988

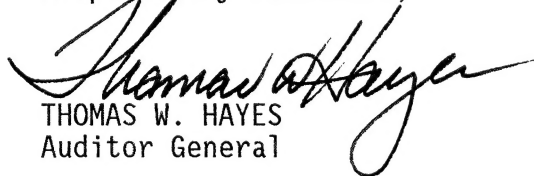
P-755

Honorable Bruce Bronzan, Chairman  
Members, Joint Legislative  
Audit Committee  
State Capitol, Room 448  
Sacramento, California 95814

Dear Mr. Chairman and Members:

The Office of the Auditor General presents its report concerning the growth and costs of California's independent study programs. Our analysis shows that independent study programs have grown from 1982-83 to 1987-88 and that the costs of the programs vary between the districts and county offices of education.

Respectfully submitted,

  
THOMAS W. HAYES  
Auditor General

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## SUMMARY

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### RESULTS IN BRIEF

Between school years 1982-83 and 1987-88, the number of school districts and county offices of education offering independent study programs increased from 452 to 672 while the revenues generated by these programs increased from approximately \$23 million to approximately \$80 million. The State will contribute approximately \$50 million of this \$80 million, with local sources contributing the remainder. The amount of revenue that school districts and county offices of education spend on their independent study programs varies. For example, during school year 1986-87, the 25 school districts and county offices of education that we reviewed spent from as little as 25 percent of the revenues that they generated from independent study to as much as 18 percent in excess of these revenues on their independent study programs.

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### BACKGROUND

Independent study is an alternative to regular classroom instruction that is available to students in kindergarten through grade 12. Independent study can be part of, separate from, or in addition to a regular classroom program. Unlike students in the regular classroom, independent study students are not required to be under the direct supervision of a teacher. Instead, students are under the general supervision of a teacher, with their programs based on a written agreement.

Independent study programs, like other education programs, generate revenue through the average daily attendance (ADA) of students. However, unlike the regular classroom, where ADA credit is earned by actual student attendance in the classroom, independent study ADA is earned and reported based on the time value that the independent

study teacher assigns to completed work assignments. School districts and county offices of education can spend on their independent study programs any portion of the revenues generated from their independent study programs, or they may spend more than the total revenues generated by independent study.

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## PRINCIPAL FINDINGS

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### Growth of Independent Study Programs

Independent study programs are expected to generate approximately \$80 million in school year 1987-88; this is more than triple the approximately \$23 million that independent study programs generated in school year 1982-83. The State will contribute approximately \$50 million (63 percent) of the \$80 million generated by independent study in school year 1987-88 while local sources will contribute the remainder. The number of school districts and county offices of education offering independent study programs has grown also, as has the number of units of ADA claimed for independent study. In school year 1982-83, 452 school districts and county offices of education claimed approximately 11,500 units of ADA for independent study while 672 school districts and county offices of education claimed approximately 27,000 units of ADA in school year 1987-88.

Although on a statewide basis the ADA claimed for independent study since school year 1982-83 has increased, student enrollment among the independent study programs that we visited both increased and decreased during the same time period.

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Variations in the Amount of Revenue  
That School Districts and County  
Offices of Education Spend on  
Independent Study Programs

In school year 1986-87, the amount that the 25 school districts and county offices of education that we visited each spent on their independent study programs ranged from as little as 25 percent of the revenues that they generated from their programs to as much as 18 percent in excess of these revenues. Appendix A presents the revenue and expenditure figures for the 25 school districts and county offices of education that we reviewed. Five of these school districts and county offices of education spent over 100 percent of the revenue that they generated from independent study on their independent study programs, six spent between 91 and 99 percent of the revenue that they generated from independent study on their independent study programs, and the remaining fourteen spent from 25 percent to 89 percent of the revenue that they generated from independent study on their independent study programs.

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Enrollment and Attendance Ratios  
for Independent Study Programs

Student-to-teacher ratios reflect the average number of students for each teacher in a program. At the five school districts where we reviewed student-to-teacher ratios, these ratios in independent study programs varied, ranging between 26 students to one teacher and 156 students to one teacher. Thus, the number of students enrolled in independent study that each independent study teacher was responsible for, on an average, ranged from 26 students to 156 students. In comparison, student-to-teacher ratios for overall instructional programs throughout each of these school districts ranged between 25 students to one teacher and 32 students to one teacher.

Average daily attendance-to-teacher ratios reflect actual attendance credit earned by students per each teacher in the program; therefore, ADA-to-teacher ratios exclude those students who may be enrolled but who do not earn attendance credit. Average daily attendance-to-teacher ratios among the independent study programs in the school districts that we reviewed did not vary as much as student-to-teacher ratios in independent study programs. At four of these school districts, each independent study teacher was responsible, on an average, for students who collectively earned from 18 to 27 units of ADA while, at the fifth school district, each independent study teacher was responsible, on an average, for students who collectively earned 91 units of ADA. In comparison, the ADA-to-teacher ratio for programs throughout these same five school districts ranged between an average of 23 units of ADA to one teacher and an average of 29 units of ADA to one teacher.

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#### AGENCY COMMENTS

The State Department of Education stated that the information provided in the audit is useful because so little statewide information about independent study is available. The department also stated that it will incorporate information from the audit into guidelines to assist local authorities to ensure fiscal and program accountability.



## INTRODUCTION

Independent study is an alternative to classroom instruction that may be offered to students in kindergarten through grade 12. Students involved in independent study programs complete course work specifically designed to meet their educational needs and interests, and they participate in independent study for a variety of reasons. Some of the students participating in the programs that we visited had a history of truancy or had previously dropped out of school. Others wanted to graduate early or held jobs while attending school.

Independent study can be part of, separate from, or in addition to a regular classroom program. A school district or the governing board of a county office of education determines the nature and type of independent study program that it wants to provide. One district that we visited operates several independent learning centers that provide a computer system offering coursework from the kindergarten level to the pre-medicine level. Another district that we visited uses a school bus outfitted as a traveling classroom to give students at various sites an opportunity to participate in independent study.

Before offering an independent study program, the governing board of a school district or county office of education adopts written policies and procedures specifying how it will operate the program. In addition, each student's program of independent study must be based on a written agreement between the student, the student's parents or legal guardian, the teacher, and any other person who has direct responsibility to provide instructional assistance to the student. The agreement must contain certain components, such as the method of evaluating student progress and the number of credits to be earned upon completion of the agreement.

Ninety-eight of the 125 high school students in our sample collectively attempted to obtain 2,688 credits and were able to obtain 2,243 (83 percent) of these credits. Of the 125 students, we were able to determine what happened to 115 at the end of the school year that we reviewed. Of these 115 students, 48 either did not re-enroll in independent study or dropped out of independent study, 28 re-enrolled in independent study, 16 received a high school diploma, and 23 either transferred to other schools, to other districts, or out of state.

Independent study programs, like other education programs, generate revenues based on the average daily attendance (ADA) of students. However, unlike the regular classroom, where students earn ADA credit by actual attendance in the classroom, attendance credit for

independent study is earned and reported based on the time value that the independent study teacher assigns to completed work assignments. To determine the amount of revenue generated, the number of units of ADA earned by a student in independent study is then multiplied by the revenue limit per unit of ADA, which is the amount of revenue that a district or county is authorized to spend for each student in attendance. School districts and county offices of education can spend on their independent study programs less than, the same as, or more than the amount of revenue generated from independent study.

In 1981, the Office of the Auditor General reported that the revenues generated exceeded reported expenditures in 9 of 11 independent study programs that were reviewed. The report also found that student enrollment in independent study programs grew 239 percent between school years 1977-78 and 1979-80 and that school districts did not always comply with requirements for developing and administering independent study agreements.

#### SCOPE AND METHODOLOGY

The purpose of this review was to provide information on the growth of independent study programs, the costs associated with independent study programs, the student-to-teacher ratios in independent study programs, and the school districts' compliance with

regulations governing independent study programs. It was not within the scope of this review to validate ADA, enrollment, and staffing data provided by school districts and county offices of education.

To analyze the growth of independent study programs, we compiled statewide statistics relating to the number of school districts and county offices of education that participate in independent study, the amount of ADA claimed for independent study, and the amount of revenue generated by independent study programs. In addition, to obtain information on student enrollment since school year 1982-83, we visited five school districts: Elk Grove Unified School District, Fullerton Union High School District, Lodi Unified School District, San Francisco Unified School District, and Sweetwater Union High School District.

At these five school districts, we also obtained the expenditures for independent study programs in school year 1986-87 and computed the ratio of students to teachers and the ratio of ADA to teachers both for independent study programs and for other programs throughout the district. When possible, we also collected demographic data on students in independent study although this data was not always kept at the school districts that we visited. Finally, to test compliance with laws and regulations that govern independent study, we reviewed files of students who had participated in independent study programs during school year 1986-87. At each of the five school districts, we selected 25 files for students in grades 9 through 12; in

addition, at three of these school districts that had independent study programs for students in kindergarten through grade 8, we selected an additional 10 files. Appendix B presents the results of this compliance test.

To obtain widespread data on the costs of independent study programs, we visited an additional 20 school districts and county offices of education. At these school districts and county offices of education, as well as at the five school districts where we conducted a more comprehensive review, we compiled all costs, both direct and indirect, that were attributed to independent study programs in school year 1986-87. We also computed the revenues generated by each independent study program that we reviewed and compared the costs of the programs to the revenues generated. We reviewed these 25 school districts and county offices of education because they claimed the largest amounts of ADA for independent study in school year 1986-87: they collectively claimed 35 percent of all ADA for independent study statewide.

## ANALYSIS

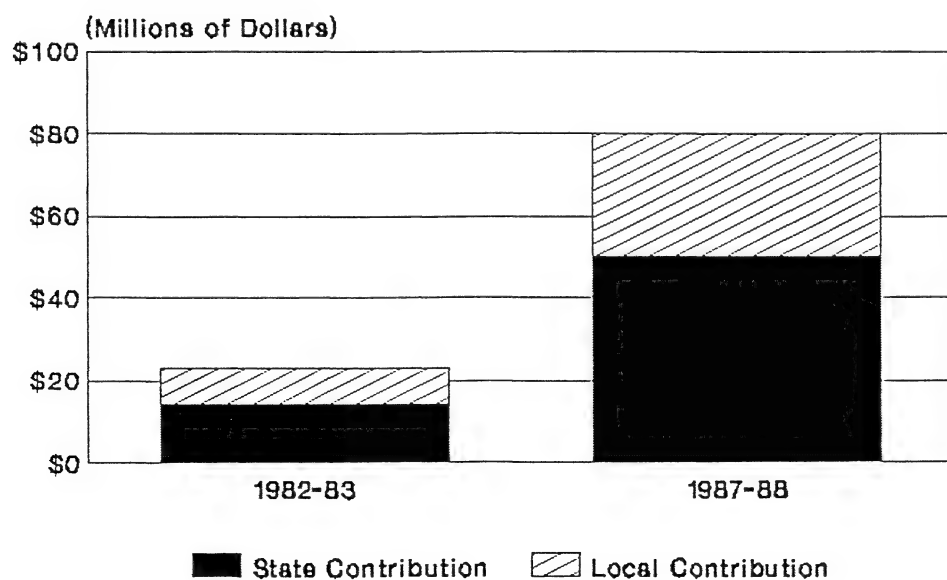
### THE GROWTH AND COSTS OF CALIFORNIA'S INDEPENDENT STUDY PROGRAMS

Between school years 1982-83 and 1987-88, the number of school districts and county offices of education in the State of California that offer independent study to students increased from 452 to 672 while the revenues that these school districts and county offices of education generated from their independent study programs increased from approximately \$23 million to approximately \$80 million. The amount of revenue that each of the 25 school districts and county offices of education in our review spent on their independent study programs varied: the amount that each of these school districts and county offices of education spent ranged from as little as 25 percent of the revenues that they generated from independent study to as much as 18 percent in excess of these revenues. In addition, student-to-teacher ratios for independent study programs ranged between 26 students to one teacher and 156 students to one teacher at the five school districts where we reviewed these ratios. Also, average daily attendance (ADA)-to-teacher ratios for independent study programs at these school districts ranged from 18 units of ADA per teacher to 91 units of ADA per teacher.

### Growth of Independent Study Programs

According to data provided by the State Department of Education, independent study programs are expected to generate approximately \$80 million in school year 1987-88; this is more than triple the approximately \$23 million that independent study programs generated in school year 1982-83. The State will contribute approximately \$50 million (63 percent) of the \$80 million generated by independent study in school year 1987-88 while the remaining \$30 million will come from local sources. The following graph illustrates the increase in revenues generated for independent study programs statewide in school years 1982-83 and 1987-88 and the portions of these revenues provided by the State and by local sources.

#### REVENUE GENERATED BY INDEPENDENT STUDY PROGRAMS



The revenues generated by independent study statewide have increased because the number of school districts and county offices of education participating in independent study has increased, the number of units of ADA claimed for independent study programs has increased, and the revenue limits per unit of ADA have increased. In school year 1982-83, 452 school districts and county offices of education statewide claimed approximately 11,500 units of ADA for independent study while, in school year 1987-88, 672 school districts and county offices of education claimed approximately 27,000 units of ADA. This is a 135 percent increase in the units of ADA claimed for independent study and a 49 percent increase in the number of school districts and county offices of education that participate in independent study. Although the number of school districts and county offices of education that participate in independent study has increased, 461 (69 percent) of the 672 school districts and county offices of education that claimed ADA for independent study in school year 1987-88 each claimed only 25 units of ADA or less, indicating that the majority has relatively small programs.

In addition to an increase in the amount of ADA claimed statewide for independent study, the average revenue limit per unit of ADA for school districts and county offices of education has also increased. In school year 1982-83, the average revenue limit per unit of ADA was approximately \$1,983 while in school year 1987-88, it is approximately \$2,965, an increase of nearly 50 percent.



Although the revenues generated from independent study programs have increased statewide, changes in student enrollment among independent study programs since school year 1982-83 have fluctuated between increases and decreases. At the five school districts where we compiled student enrollment data, changes in student enrollment in independent study between school years 1982-83 and 1987-88 ranged from an increase of 466 percent at Sweetwater Union High School District to a decrease of 35 percent at San Francisco Unified School District. In contrast, enrollment throughout each of these five districts ranged from an increase of 32 percent to a decrease of 8 percent. Table 1 compares changes in student enrollment in independent study programs to changes in districtwide enrollment in instructional programs throughout the five school districts that we visited.

TABLE 1

ENROLLMENT IN FIVE SCHOOL DISTRICTS'  
INDEPENDENT STUDY PROGRAMS COMPARED WITH ENROLLMENT  
IN INSTRUCTIONAL PROGRAMS THROUGHOUT THESE DISTRICTS  
SCHOOL YEARS 1982-83 THROUGH 1987-88

(Unaudited)

School District	Number of Students Enrolled in Independent Study 1982-83	Number of Students Enrolled in Independent Study 1987-88	Percent Change in Independent Study Enrollment	Number of Students Enrolled in Programs Throughout the District 1982-83	Number of Students Enrolled in Programs Throughout the District 1987-88	Percent Change in Enrollment Throughout the District
Sweetwater Union High School District	178	1,008	466	22,329	25,888	16
Lodi Unified School District	96	432	350	16,009	21,206	32
Elk Grove Unified School District	551	1,017	85	14,237	19,817	39
Fullerton Union High School District	1,199	938	(22)	13,214	12,157	(8)
San Francisco Unified School District*	665	432	(35)	19,920	20,234	2

\* The enrollment data for this district is for the Center for Independent Study only; the district did not maintain enrollment data for other students participating in independent study.

Variations in the Amount of Revenue  
That School Districts and County  
Offices of Education Spend on  
Independent Study Programs

The amount of revenue that each of the 25 school districts and county offices of education spend on their independent study programs varies. In school year 1986-87, the 25 school districts and county offices of education that we reviewed spent from as little as 25 percent of the revenues that they generated from their independent study programs to as much as 18 percent in excess of these revenues. Five (20 percent) of the 25 school districts and county offices of education that we visited spent more on their independent study programs than the total revenues that they generated from independent study. Each of these school districts and county offices of education spent on their independent study programs from one percent to 18 percent in excess of the revenues that they generated from independent study. For example, Grant Joint Union High School District generated \$776,448 from independent study while it spent approximately \$917,066 (18 percent in excess of the revenues) on its independent study program.

Six (24 percent) of the school districts and county offices of education that we visited spent about the same amount on their independent study programs as they generated in revenues; between 91 and 99 percent. The remaining 14 (56 percent) school districts and county offices of education spent between 25 and 89 percent of the

revenues that they generated from independent study. For example, Lodi Unified School District generated \$685,627 from independent study while it spent approximately \$168,140 (25 percent) on its independent study program. Appendix A shows the school districts and county offices of education that were part of our review, the revenues and expenditures for their independent study programs, and the differences in these amounts.

#### Enrollment and Attendance Ratios for Independent Study Programs

Unlike teachers in the regular classroom, independent study teachers are not required to provide direct supervision to students. Instead, independent study teachers provide general supervision. General supervision includes responsibilities such as designing the student's learning plan, evaluating progress towards the plan's objectives, and assessing student effort and recording it as attendance. Despite variations among school districts, students in independent study generally meet with the independent study teacher for a minimum of one hour per week. In addition to certificated teachers, some school districts also employ teachers' aides for their independent study program.

Student-to-teacher ratios reflect the average number of students enrolled in a program for each teacher in that program. At the five school districts where we reviewed student-to-teacher ratios, these ratios in independent study programs varied. For example, at

Sweetwater Union High School District, each independent study teacher was responsible, on an average, for 26 students enrolled in independent study while, for grades 9 through 12 at Lodi Unified School District, each independent study teacher was responsible, on an average, for 156 students enrolled in independent study. However, student-to-teacher ratios for overall instructional programs throughout each of these five school districts did not vary as much as student-to-teacher ratios for independent study programs. Student-to-teacher ratios for instructional programs throughout each of these school districts ranged between 25 enrolled students to one teacher and 32 enrolled students to one teacher.

While student-to-teacher ratios only reflect student enrollment per teacher, ADA-to-teacher ratios reflect actual attendance credit earned by students for each teacher in the program. Therefore, ADA-to-teacher ratios exclude those students who may be enrolled but who do not earn attendance credit either by completing work assignments in independent study programs or by attending classes in regular classroom programs. Among the five school districts that we reviewed, ADA-to-teacher ratios in independent study programs did not vary as much as student-to-teacher ratios in independent study programs. With the exception of one school district, ADA-to-teacher ratios in independent study ranged from 18 units of ADA per teacher to 27 units of ADA per teacher. That is, at these four school districts, each independent study teacher was responsible, on an average, for students who collectively earned from 18 to 27 units of ADA. At the fifth

school district, Lodi Unified School District, each independent study teacher was responsible, on an average, for students who collectively earned 91 units of ADA. In comparison with these ADA-to-teacher ratios for independent study programs, the ADA-to-teacher ratios for instructional programs throughout these same five school districts ranged from 23 units of ADA per teacher to 29 units of ADA per teacher. That is, each teacher was responsible, on an average, for students who collectively earned from 23 to 29 units of ADA.

Table 2 compares the student-to-teacher ratios for independent study programs at five districts in our review with student-to-teacher ratios for programs throughout these districts. It also compares the ADA-to-teacher ratios for these independent study programs with ADA-to-teacher ratios for instructional programs throughout the districts.

**TABLE 2**  
**STUDENT-TO-TEACHER AND ADA-TO-TEACHER RATIOS**  
**FOR INDEPENDENT STUDY IN FIVE SCHOOL DISTRICTS**  
**COMPARED WITH THESE RATIOS FOR INSTRUCTIONAL PROGRAMS**  
**DISTRICTWIDE FOR THE 1986-87 SCHOOL YEAR\***  
**(Unaudited)**

<u>School District</u>	<u>Students per Teacher for Independent Study</u>	<u>Students per Teacher Districtwide</u>	<u>Units of ADA per Teacher for Independent Study</u>	<u>Units of ADA per Teacher Districtwide</u>
Elk Grove Unified School District**	52	30	27	28
Fullerton Union High School District**	67	32	27	28
Lodi Unified School District	156	26	91	25
San Francisco Unified School District**	28	25	23	23
Sweetwater Union High School District**	26	29	18	29

\* For grades 9 through 12 at all school districts except Sweetwater Union High School District; ratios for this district include grades 7 through 12.

\*\* The ratios in this table reflect only the equivalent of fulltime credentialed teaching staff; however, these districts also have teachers' aides for independent study in addition to the credentialed teaching staff.

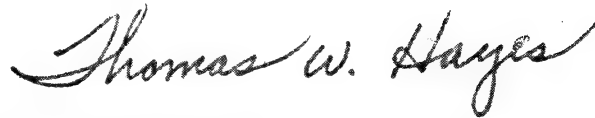
## CONCLUSION

Between school years 1982-83 and 1987-88, the number of school districts and county offices of education participating in independent study grew by 49 percent while the amount of average daily attendance that these school districts and county offices of education claimed increased by 135 percent. In this same period, the revenues generated by independent study programs have more than tripled. However, the amount of revenue that school districts and county offices of education spend on their independent study programs varies considerably. In addition, student-to-teacher ratios among independent study programs in our sample vary while ADA-to-teacher ratios among these independent study programs generally do not vary as significantly.



We conducted this review under the authority vested in the Auditor General by Section 10500 et seq. of the California Government Code and according to generally accepted governmental auditing standards. We limited our review to those areas specified in the audit scope section of this report.

Respectfully submitted,

A handwritten signature in cursive script that reads "Thomas W. Hayes". The signature is written in dark ink and is positioned above a horizontal line.

THOMAS W. HAYES  
Auditor General

Date: July 5, 1988

Staff: Thomas A. Britting, Audit Manager  
Janice Simoni  
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Barbara Ruona  
Max Bushman  
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**APPENDIX A**

**A COMPARISON OF REVENUES TO EXPENDITURES  
FOR A SAMPLE OF INDEPENDENT STUDY PROGRAMS  
SCHOOL YEAR 1986-87\*  
(Unaudited)**

<u>District or County</u>	<u>Independent Study Revenues</u>	<u>Independent Study Expenditures</u>	<u>Difference</u>	<u>Percent of Revenues Spent</u>
Grant Joint Union High School District	\$ 776,448	\$ 917,066	\$(140,618)	118
Kern County Union High School District	1,644,088	1,922,250	(278,162)	117
Sweetwater Union High School District	1,451,075	1,641,161	(190,086)	113
San Ramon Valley Unified School District	821,327	833,975	(12,648)	102
San Diego County Office of Education	1,150,913	1,162,306	(11,393)	101
Mt. Diablo Unified School District	686,150	682,670	3,480	99
San Francisco Unified School District	920,703	904,323	16,380	98
Pomona Unified School District	555,553	537,082	18,471	97
Santa Clara Unified School District	1,083,538	1,042,722	40,816	96
Colton Joint Unified School District	589,436	551,876	37,560	94

\* The costs that a school district or county office of education incurs through independent study can vary from year to year depending upon variables such as large equipment purchases, costs of starting a program, or increases in leasing of facilities.

<u>District or County</u>	<u>Independent Study Revenues</u>	<u>Independent Study Expenditures</u>	<u>Difference</u>	<u>Percent of Revenues Spent</u>
Elk Grove Unified School District	\$1,470,219	\$1,342,441	\$ 127,778	91
Fremont Union High School District	673,415	598,517	74,898	89
Madera Unified School District	1,018,470	900,395	118,075	88
Santa Clara County Office of Education	1,998,043	1,746,015	252,028	87
Modesto City High School District	742,571	612,528	130,043	83
Sacramento City Unified School District	567,435	454,751	112,684	80
Kerman Unified School District	1,099,073	789,388	309,685	72
San Juan Unified School District	578,196	414,203	163,993	72
Orange County Office of Education	1,270,244	902,035	368,209	71
Grossmont Union High School District	715,815	453,247	262,568	63
Fresno City Unified School District	1,816,260	1,069,573	746,687	59
Fullerton Union High School District	1,341,981	755,366	586,615	56
Riverside Unified School District	671,783	366,327	305,456	55
Merced Union High School District	1,466,965	738,901	728,064	50
Lodi Unified School District	685,627	168,140	517,486	25

THE RESULTS OF OUR COMPLIANCE REVIEW

Requirements for developing and administering independent study agreements are delineated in both the Education Code and the California Code of Regulations. Section 51746 of the Education Code requires that a school district or county board of education ensure that the independent study program for each student is written. Title 5 of the California Code of Regulations further stipulates that written agreements for independent study be signed by the student, the student's parents or legal guardian, and the student's independent study supervisor. In addition, the California Code of Regulations requires that these agreements must include the following:

- The duration of the independent study agreement;
- The manner, frequency, time, and place of reporting progress by the student;
- The title and statement of the course's major objectives;
- The method of evaluation; and
- A statement of the number of credits to be earned upon completion of the agreement.

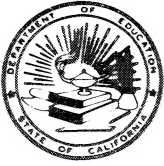
The California Code of Regulations also requires that school districts and county offices of education maintain on file all independent study agreements.

We reviewed a sample of five school districts--Elk Grove Unified School District, Fullerton Union High School District, Lodi Unified School District, San Francisco Unified School District, and Sweetwater Union High School District--to test for compliance with the requirements for developing and administering independent study programs.

None of the five school districts were able to provide all of the independent study agreements that we requested. Noncompliance with the requirement that written agreements for independent study be kept for each student ranged from 3 percent to 32 percent. Two of the school districts were responsible for the most significant portion of noncompliance with this requirement. Sweetwater Union High School District could not provide 8 (32 percent) of the 25 high school agreements requested, and Lodi Unified School District could not provide one of the 10 elementary school agreements requested and 10 of the 25 high school agreements requested (31 percent of the 35 agreements requested).

Of the remaining school districts, San Francisco Unified School District could not provide 2 of the 10 elementary school agreements requested but did provide all 25 high school agreements requested, and Elk Grove Unified School District provided all 10 elementary school agreements requested but could not provide one high school agreement requested. Finally, Fullerton Union High School District could not provide 3 of the 25 agreements requested. However, two of these three agreements were for students who enrolled but never attended independent study classes. Therefore, Fullerton did not comply with the requirement for independent study agreements in one case only.

In addition to school districts not being able to provide all of the independent study agreements that we requested, not all independent study agreements that we received from each of the five districts contained all of the required components, such as the duration of the independent study agreement or the signature of the student's parents. Because each school district is responsible for conducting its independent study program in accordance with the provisions of the Education Code and the rules and regulations outlined in the California Code of Regulations, we sent management letters to each of the five districts, bringing to their attention the noncompliance that we found.

**CALIFORNIA STATE DEPARTMENT OF EDUCATION**

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**Bill Honig**

Superintendent

of Public Instruction

June 28, 1988

Thomas W. Hayes, Auditor General  
Office of the Auditor General  
660 J Street, Suite 300  
Sacramento, California 95814

Re: P-755

Dear Mr. Hayes:

Thank you for the opportunity to review and comment on your draft report entitled "The Growth and Costs of California's Independent Study Programs." The study and its findings are very useful to us because of the dearth of data and information about public schools and programs of choice, including Independent Study, and the specific issues and questions you addressed. The policy of restricting the demands on local school authorities for non-mandated information and the lack of research in this area have combined to create a need which efforts such as yours help to meet.

We note that the sample in your study consisted of the 25 school districts and county offices of education with the largest amounts of ADA for independent study in 1986-87, and so was not a stratified random sample. We regret that you were not able to select and examine a larger and random sample of programs. Because of this we must caution readers that generalizations about the total population cannot be drawn, either statistically or as regards program quality. ①\*

We observe that the important characteristics of students in the independent study programs your staff reviewed which are mentioned in the Introduction are only partial, and many other different features characterize the students who may be enrolled in part-time and full-time Independent Study Programs (ISP) throughout the State. For example, for the "regular" senior high school student, ISP is a major option for taking one or two courses required for graduation that happen to be unavailable as needed in the school schedule. Part-time ISP can be a temporary substitute for "school" during a parent's vacation in the school year as well as a single course or unit in a program that is otherwise delivered in school classrooms. Its major values in general are the flexibility it offers and its suitability for effective responses to differences in student learning styles that are not adequately accommodated in regular school situations. These are the accommodations that, in some situations, facilitate high student achievement and neutralize frustrations.

\*The Office of the Auditor General's comment on this specific point appears on page 25.

Thomas W. Hayes  
June 28, 1988  
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Concerning your observations about student effort and achievement, we would add that ISP tends to be productive in two ways: at the senior high school level, like schools of choice in general, ISP tends to produce a higher proportion of graduates than regular schools, and many of these graduates would not have graduated were it not for ISP. Because of our liaison with the California Consortium of Independent Study, we have some individual reports from districts. For example, the Elk Grove Unified School District reported that 223 students graduated in June 1988, many of whom were immigrants from Southeast Asia, an estimated 90 percent of whom would probably not have completed high school but for Independent Study. The San Francisco program reported that 167 high school students graduated, 41 percent of whom were proceeding immediately to postsecondary education and an estimated 42 percent of whom would probably not have graduated but for ISP.

We see a need for replications or supplementary studies regarding several aspects of Independent Study. One area of interest to many is Independent Study as offered in smaller districts and smaller programs. For example, regarding the 641 districts and county offices that reported ADA to this Department in the range of 25 or less units in April, 1988, we do not know what that data represent in terms of enrollment, duration of the student's program, and whether or not the ISP was full-time or part-time.

While we know that the state total of ADA from Independent Study has been growing for the past four years at a rate of about 25 percent per annum, we do not know much about why and how that increase has occurred. Your findings reveal that the rate of growth is neither consistent nor continuous for all districts in your sample. It would be useful to know what may account for sustained and for sporadic growth as well as for drops.

We view the great range in percent of revenue spent on programs--118 percent to 25 percent--to indicate the need for another study addressed to program costs and especially to identifying and understanding the major differences and their significance. This desire is especially relevant in view of our focus on fiscal accountability. We believe that all concerned need to consider program costs in the context of several measures of productivity, including:

- 1) The proportion of twelfth graders in ISP who graduate, and how many of these a) graduate with academic honors, b) proceed directly to post-secondary education, c) are fully employed upon graduation, and so forth
- 2) The proportion of twelfth graders in ISP who do not complete high school and an analysis of what they do next

3) The proportions of all enrolled students in ISP who complete the various mandated examinations, at the various levels, during the time period when they are expected to meet these requirements

4) The proportion of all enrolled students in ISP who advance each year, as expected for them, to the next grade level

At this time, the Department of Education has neither the staffing nor the funding to conduct the studies described above. The Department is authorized and funded one-half of one consultant position (and related administrative and support services) for all functions pertaining to the Independent Study Program in California.

We are presently engaged in an effort to revise the Independent Study Operations Manual. We will further incorporate what we have learned from this report into guidelines to assist local authorities to ensure fiscal and program accountability.

We commend the Office of Auditor General and the particular audit team that conducted this study on the high quality and utility of this report. We are grateful for the data and findings, especially since so little statewide information about Independent Study in California is available. If you wish to follow up with our staff, feel free to continue to confer with Lynn P. Hartzler, Consultant for Independent Study at 322-1048, or Constance Barber, the Administrator of the Alternative Education Unit, at 323-2574.

Sincerely,



William D. Dawson  
Executive Deputy Superintendent

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The Office of the Auditor General's Comment:

- ① As we point out on page 9 of the report, 69 percent of the school districts and county offices of education that participated in independent study in 1987-88 claimed only 25 units of ADA or less, indicating that their programs are relatively small. In order to document growth and expenditure patterns among independent study programs, we chose to focus on the 25 school districts and county offices of education that claimed the largest amounts of ADA for independent study in 1986-87. We believe that obtaining this data from the school districts and county offices of education that have the largest independent study programs is more meaningful than reviewing a random sample that may include independent study programs with small numbers of students and relatively minor costs. Based upon the statewide and sampled data we provide in the report, we believe that the conclusions we reach regarding growth, costs, and program variety are fully supported.



cc: Members of the Legislature  
Office of the Governor  
Office of the Lieutenant Governor  
State Controller  
Legislative Analyst  
Assembly Office of Research  
Senate Office of Research  
Assembly Majority/Minority Consultants  
Senate Majority/Minority Consultants  
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